

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DAVID WHITT,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18-cv-1294
)	
CITY OF ST. LOUIS, et al.,)	JURY TRIAL DEMANDED
)	
Defendants.)	

**MEMORANDUM IN SUPPORT OF PLAINTIFF’S CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND TO MOTIONS TO DISMISS**

Plaintiff David Whitt seeks additional time to respond to the defendants Ryan J. Linhorst, Matthew T. Karnowski, and Matthew A. Shaw’s two motions to dismiss, which were filed on September 14, 2018. (Docs. 23-26.) Pursuant to E.D.Mo. L.R.4.01(B), Plaintiff’s oppositions are currently due September 21, 2018, absent any further order of the Court.

The Court may extend any time limit imposed by the Local Rules for good cause shown. E.D.Mo. L.R. 1.05. Plaintiff’s counsel requires additional time to respond to the two motions to dismiss due to commitments for other cases and clients, including out of town travel, preparation for upcoming trial before the Twenty-Second Judicial Circuit of Missouri, and preparation for upcoming oral argument before the Eighth Circuit Court of Appeals. These obligations constitute good cause for an extension of time, and Plaintiff’s counsel respectfully request an extension of time to respond to defendants’ motions to dismiss, up to and including September 25, 2018. This would align the briefing schedule on all pending motions to dismiss.

Defendants Linhorst, Karnowski, and Shaw consent to the relief sought herein. This request is not being made for purposes of delay, but is brought in good faith. Further, no party will be prejudiced by the grant of this motion.

WHEREFORE, Plaintiff David Whitt respectfully requests that this Court grant Plaintiff an extension of time until September 25, 2018 within which to respond to the defendants' motions to dismiss, and grant any further relief as is just and proper.

Date: September 17, 2018

Respectfully submitted,

By: /s/ Shaleen Morales
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CERTIFICATE OF SERVICE

I certify that on this 17th day of September, 2018, I filed a copy of the foregoing using the court's CMF/ECF system, which will provide service of the same on all counsel of record.

By: /s/ Shaleen Morales